

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GIDEON RAPAPORT,

Plaintiff,

Case No.: 1:23-cv-06709 (JGLC)

-against-

AJAY SRINIVASAN IYER,
ZACHARY GEORGE GARRETT, and
RICHARD ALLEN EPSTEIN,

Defendants.

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**DECLARATION OF ZACHARY GEORGE GARRETT IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO DIQUALIFY
DEFENDANT'S COUNSEL, SCHAEER JAFFE, LLP**

My name is Zachary Garrett. I am over the age of 18 and fully competent in all respects to make this declaration. All of these facts are true and correct.

1. In July 2024, I retained the law firm, Schaerr | Jaffe LLP ("Firm"), to represent me in this case.
2. At the time I retained the Firm, I was fully aware that the Firm would represent both myself and Ajay Srinivasan Iyer as co-defendants in this case.
3. I have spoken with the Firm about the risks and advantages of joint representation.
4. At the time I retained the Firm, I also understood that joint representation can carry risks, one of which is a possible conflict of interest among co-defendants.
5. Because my interests in this case align with Mr. Iyer's in that we both vehemently deny the allegations that accuse us of any wrongdoing—either jointly or separately—I viewed the benefits of joint representation to outweigh any risks.

6. As a result of those benefits, I signed a waiver at the time I retained the Firm, acknowledging the risks of joint representation when it comes to confidential information and conflicts of interest.

7. I understand that a conflict could potentially arise in the future, but I do not see any current conflict between my interest and Mr. Iyer's interests in this case.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

A handwritten signature in black ink, appearing to read 'ZG Garrett', is written above a horizontal line.

Dated: September 25, 2024

Zachary G. Garrett